

**Ackerman, Joyce**

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**From:** Ackerman, Joyce  
**Sent:** Monday, November 13, 2017 1:45 PM  
**To:** Stovall - CDPHE, Curtis; Walker - CDPHE, David  
**Cc:** Sandusky, Eric  
**Subject:** Neuhauser: Stewart Environmental May 2017 report

Dear Curt and Dave – I am going to begin documenting the errors and omissions in the Stewart Environmental reports. In the statement of work for the Consent Agreement, I was trying to cite some information from the May 2017 report regarding contaminated soils. In reading Section 3.6 “Organic Contamination Investigation”, here’s what I found:

- Appendix C sampling results: Can’t tell for certain what lab did the analyses. In one case, lab ACZ is checked, implying that all other analyses were conducted by Stewart. The ACZ lab report is not attached.
- App. C: Stewart lab results do not show any units for the results, (no ppm, no ppb, no mg/L, nothing)
- App C.: Description of samples does not match chain of custody – depths of test pits mis-typed
- Drum sample is mis-identified in the lab report as “Pit #5 – 5 to 6 ft” and the matrix is listed as “soil.”
- App C – The ACZ data references a solvent barrel from Pit #6. There is no drum mentioned from Pit #6, so the writer of the chain of custody (last page of the sampling data) probably wrote it down wrong.
- Figure 3-5 : I can’t tell if the numbers of the test pits match up with the numbers on the chain of custody and sample data
- Table 5-1 Soil Testing Summary Tab – Columns are not labeled very well (3 columns for Test Pit 4, and I couldn’t find the criteria for concluding why there were no indications of organics). Also, the table shows a “TCLP result” which appears to invoke the 20-times dilution rule. This would not be applicable if the contents of the drum were liquid. I have not seen a description of the drum contents, whether it was liquid or sludge.

Please let me know if I’m wrong on any of this, or if you have identified additional discrepancies. I haven’t gone over the rest of this report in detail, or the other reports. It is possible that the problems in quality may become a significant issue at some point, so I want to keep a record. I have also copied Eric Sandusky with this e-mail, who is an EPA contractor who will be assisting me in overseeing the work at the Site.

Thanks!

Joyce

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